



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

WNI 18-023404

Shapiro & DeNardo, LLC  
14000 Commerce Parkway, Suite B  
Mount Laurel, NJ 08054  
(856)793-3080  
Chandra M. Arkema - 029552006  
Krystin M. Kane - 171402015  
Kathleen M. Magooon - 040682010  
Donna L. Skilton - 013072007  
Charles G. Wohlrab - 016592012  
Courtney A. Martin - 098782016  
Jeffrey Rappaport - 003431991  
ATTORNEYS FOR WELLS FARGO BANK, N.A.

IN RE:

ROBERT L. FRANKLIN, DEBTOR

Order Filed on August 23, 2018  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

CASE NO.: 17-21641-ABA

HEARING DATE: AUGUST 22, 2018

JUDGE: HONORABLE ANDREW B.  
ALtenburg, Jr.

**CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

DATED: August 23, 2018

A handwritten signature in black ink, appearing to read "ABJ".

---

Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

This matter being opened to the Court by Jennifer L. Kearney, Esq., attorney for the Debtor upon filing of a Chapter 13 Plan, and Wells Fargo Bank, NA, hereinafter "Secured Creditor," by and through its Authorized Agent, SHAPIRO & DENARDO, LLC, upon the filing of an Objection to Confirmation of Plan, and the parties having subsequently resolving their differences with regard to the Debtor's Chapter 13 Plan; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and the court considered the parties' application for entry of this Consent Order, and for other good cause shown,

1. Debtor and Secured Creditor agree that Secured Creditor's lien secured by Debtor's real property located at 204 East Patcong Avenue, Linwood, New Jersey 08221, shall be modified pursuant to 11 U.S.C. §1322(b)(2) and all other relevant provisions, and classified as a wholly unsecured claim.
2. Debtor and Secured Creditor agree Secured Creditor's lien secured by Debtor's real property located at 204 East Patcong Avenue, Linwood, New Jersey 08221, will not be avoided or modified in any way, in the event the instant case (17-21641-ABA) dismisses or otherwise fails to result in the completion of Debtor's Chapter 13 Plan and issuance of a Discharge Order.
3. Secured Creditor, Wells Fargo Bank, NA, agrees that this Consent Order resolves the Objection to Confirmation, ECF No.: 66, filed on June 29, 2018 for the lien associated with Proof of Claim No. 2-1.

We hereby consent to the form, content,  
and entry of the within Order.

Shapiro & DeNardo, LLC

Date: 8-21-18

Charles G. Wohlrab, Esquire  
Attorney for the Secured Creditor

Date: 8/21/18

Jennifer L. Kearney, Esquire  
Attorney for the Debtor